

publication, registration date, and registration number issued by the United States Copyright Office is set forth on Exhibit B.

25. Plaintiff's evidence establishes that Defendant is a habitual and persistent BitTorrent user and copyright infringer.

Miscellaneous

26. All conditions precedent to bringing this action have occurred or been waived.

27. Plaintiff has retained counsel and is obligated to pay said counsel a reasonable fee for its services.

COUNT I
Direct Infringement Against Defendant

28. The allegations contained in paragraphs 1-27 are hereby re-alleged as if fully set forth herein.

29. Plaintiff is the owner of the Copyrights-in-Suit, as outlined in Exhibit B, each of which covers an original work of authorship.

30. By using BitTorrent, Defendant copied and distributed the constituent elements of each of the original works covered by the Copyrights-in-Suit.

31. Plaintiff did not authorize, permit or consent to Defendant's distribution of its works.

32. As a result of the foregoing, Defendant violated Plaintiff's exclusive right to:

- (A) Reproduce the works in copies, in violation of 17 U.S.C. §§ 106(1) and 501;
- (B) Redistribute copies of the works to the public by sale or other transfer of ownership, or by rental, lease or lending, in violation of 17 U.S.C. §§ 106(3) and 501;
- (C) Perform the copyrighted works, in violation of 17 U.S.C. §§ 106(4) and 501, by showing the works' images in any sequence and/or by making the sounds accompanying the

works audible and transmitting said performance of the works, by means of a device or process, to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definitions of "perform" and "publically" perform); and

(D) Display the copyrighted works, in violation of 17 U.S.C. §§ 106(5) and 501, by showing individual images of the works nonsequentially and transmitting said display of the works by means of a device or process to members of the public capable of receiving the display (as set forth in 17 U.S.C. § 101's definition of "publically" display).

33. Defendant's infringements were committed "willfully" within the meaning of 17 U.S.C. § 504(c)(2).

WHEREFORE, Plaintiff respectfully requests that the Court:

(A) Permanently enjoin Defendant and all other persons who are in active concert or participation with Defendant from continuing to infringe Plaintiff's copyrighted works;

(B) Order that Defendant delete and permanently remove the digital media files relating to Plaintiff's works from each of the computers under Defendant's possession, custody or control;

(C) Order that Defendant delete and permanently remove the infringing copies of the works Defendant has on computers under Defendant's possession, custody or control;

(D) Award Plaintiff statutory damages per infringed Work pursuant to 17 U.S.C. § 504-(a) and (c);

(E) Award Plaintiff its reasonable attorneys' fees and costs pursuant to 17 U.S.C. § 505; and

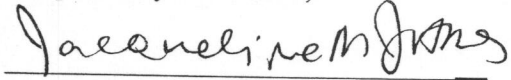
(F) Grant Plaintiff any other and further relief this Court deems just and proper.

DEMAND FOR A JURY TRIAL

Plaintiff hereby demands a trial by jury on all issues so triable.

Respectfully submitted,

By:



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File Hashes for IP Address 108.46.26.15

ISP: Verizon FiOS

Physical Location: New York, NY

Hit Date UTC	File Hash	Title
10/01/2014 05:21:39	48B418771A04AAACE4BCD42C13972FDD4F3920B9	All Oiled Up
09/29/2014 03:20:40	32FC59A15B8A0E00D0B3F4433568EE5D7E1FDA72	Sparks
09/26/2014 04:05:40	COB193093F20C427BC9A3FDE6136381BE1A87B9E	Rock Me Baby
09/26/2014 04:04:47	078E88F6677A1C62F9F7BA6E346C9012B64D8B93	Perfect Timing
09/18/2014 05:05:35	21CC9225044A02142E826FC86ACA140656096495	Shes A Spinner
09/14/2014 06:13:38	E19608A380119EB41279BC3EC49D1392EE3658EC	Come Close
09/14/2014 06:06:56	EB8A122A70175A1A120519959FA3AE7D8522D5FC	Meet Me in Madrid
09/14/2014 05:49:41	D6BA60E14052BB9AF9EBF76987738E29B9B24BDA	Feeling Frisky
09/11/2014 08:12:48	0FF626A25C6D273A4CCA0268C594825EE159913B	Go Down On Me
09/11/2014 07:09:38	3CA99A2813FCF9C8901792B85B581D457E328814	Anneli Leila Menage A Trois
08/31/2014 02:29:22	FD39C1A5177281CC4B073C3BD31D5F4C752FA2ED	Many Shades of Grey
08/27/2014 03:26:24	FEA716E38C8642A245E4EB7CDE9AA67ECC2865DA	Pretty Bad Girl
08/14/2014 02:48:36	23999DB5EF5D40B73E936402C11E05754FC6C625	Wake Me Up Like This
07/17/2014 05:25:28	28D254BBB8DF3F45585100E8DD4C71653F8F0F44	From Three to Four Part 2
07/09/2014 05:55:49	B9D3355ED996013B2B4E3BE5EA4600F6561F93A8	Tie Her Up For Me
07/01/2014 05:18:26	D6B480CF85D6849D39E59EA8D68DB70B28F2FAE4	Drinks For Two
06/21/2014 05:46:48	0260EBD4C4ABA9E3288657263F8958884A130F5E	I Love X Art
06/17/2014 04:18:26	D51A34DF11B9480081D9B13C142CCA326357D0BE	Enjoy My Backdoor
06/09/2014 09:08:58	FF5D96473B2158BB2A6D3AEA6C16E7DD61D46311	Dancing Romance
06/06/2014 20:49:06	BDC50EF4270640FF7D61551C16CDB17D97A472E2	Just Watch Part 2
05/19/2014 05:11:42	3E4968CC6071DC42C22F6E24DDD4532F02D1B59E	Zeppelin on Fire
05/13/2014 05:10:49	0D58932E6D94584369F96A44312102A094D67BB1	Waterfall Emotions